

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES,</b> Plaintiff	Case No. 3:10-00260-15
vs	Hon. Haynes
<b>DAHIR NOR IBRAHIM,</b> Defendant	

*DNIB*  
*Motion to*  
*join 6/23/12*  
*Will*  
*W*  
*4/23/12*

**MOTION TO JOIN DEFENDANT NO. 8'S MOTION TO EXCLUDE TESTIMONY  
OF JANE DOE 5**

Defendant Dahir Nor Ibrahim, Defendant No. 15, moves to join the motion to exclude the testimony of Jane Doe 5 filed by Defendant No. 8. (D.E. 2338).

As additional grounds, Defendant states as follows:

1. The government filed a response to the Court's order regarding Defendant's motion for a bill of particulars on March 28, 2012. (D.E. 2188) In that response, the government alleged the following facts against the Defendant:
  - a. In 1999, when Jane Doe 5 was allegedly 15 years of age, she was prostituted by Defendant No. 1.
  - b. Dahir "Lucky" (Def. No. 15) took girls to apartments in Minnesota on a regular basis.
  - c. "Everyone knew" Lucky and that Lucky "gave all the guys money".
  - d. Lucky and Adan (Def. No. 1) prostituted "other girls" who were teenagers.
  - e. Lucky recruited teenagers.
  - f. Lucky took these girls to various apartments for prostitution.
  - g. All the above occurred in the summer of 1999 and 2000.
    - i. 18 U.S.C. 1591 was enacted in October 28, 2000, P.L. 106-386 §112(a)(2), 114 Stat. 1487. Therefore, each and every act alleged above occurred before the law was enacted and were not illegal under federal